

SHER TREMONTE LLP

May 13, 2020

**BY ECF**

The Honorable Sarah L. Cave  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Reinaldo Roman*,**  
Case No. 19 Cr. 116 (KMW)

Dear Judge Cave:

We write on behalf of our client, Reinaldo Roman, and on consent of the government, to respectfully request that the status conference in the above-referenced matter, currently scheduled for Friday, May 15, 2020, be adjourned for three months, and that Mr. Roman's bail be continued during the interim.

By order dated March 27, 2020, ECF No. 159 (the "Order"), Your Honor released Mr. Roman to home confinement pending sentence. The Order is set to expire on May 26, 2020, 60 days from the date it was issued, "at which time the need for [Mr. Roman's] continued release under the 'compelling reason' that release was ordered shall be revisited by the Court." *See* Order, ECF No. 159.

Mr. Roman has fully complied with all conditions set in the Order. Since his release, Mr. Roman has been under the supervision of Pretrial Services Officer Jonathan Lettieri. The undersigned spoke with Officer Lettieri by phone on Monday, May 11. Officer Lettieri advised that Mr. Roman had been "perfectly compliant" with all conditions and that Pretrial Services did not object to Mr. Roman's continued release past May 26, 2020. In sum, Mr. Roman has demonstrated that his release does not pose a danger to the community.

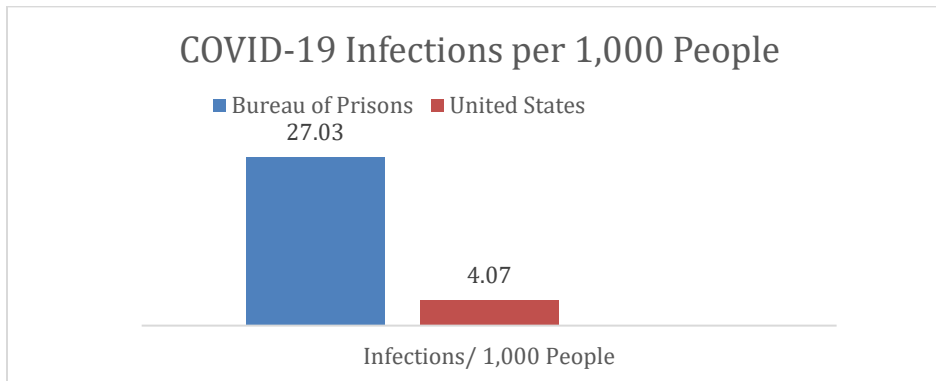
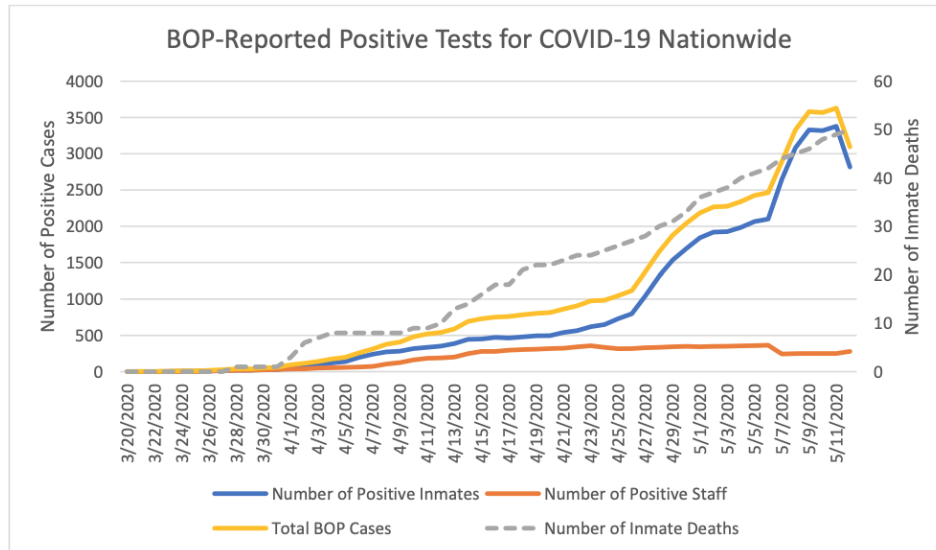
Moreover, as numerous publications and the Bureau of Prisons' own data reveal, the novel coronavirus has been spreading rapidly within BOP facilities. As of yesterday, over 4000 inmates and 500 BOP staff members have tested positive, 49 have died of COVID-19. The diagrams below illustrate the astounding infection rate among the

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imprisoned populations—several times that for the general public in the United States.<sup>1</sup>



In the meantime, Mr. Roman’s underlying medical conditions—in particular, his hypertension—remain a cause of concern and subject him to a heightened risk of becoming seriously ill should he contract COVID-19. Among other things, Mr. Roman still suffers from persistent headaches and elevated blood pressure on a daily basis. He has been advised, during a recent visit to a neurologist, that a higher dosage of the hypertension medicine, lisinopril, will likely be required to improve these symptoms.

In light of Mr. Roman’s demonstrated ability to comply with his bail conditions, and given that the “compelling reason” under which the Court ordered Mr. Roman’s release remains, we respectfully request that the Court extend Mr. Roman’s bail for three months and adjourn the status conference to a date in mid-August that is convenient for the Court. We have conferred with AUSA Michael Krouse, who indicated that the government has no objection to either request.

<sup>1</sup> Federal Defenders of New York, <https://federaldefendersny.org/> (last updated May 12, 2020).

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We appreciate the Court's consideration.

Respectfully submitted,

/s/

Michael Tremonte

Heather Y. Han

*Attorneys for Reinaldo Ramon*

cc: AUSA Michael Krouse (by ECF)  
AUSA Adam Hobson (by ECF)  
Pretrial Services Officer Jonathan Lettieri (by email)

Application GRANTED. The Status Conference scheduled for May 15, 2020 is adjourned sine die. Mr. Roman's bail conditions shall be continued for a further 90 days, or until otherwise ordered by Judge Wood. By August 7, 2020, if a sentencing hearing has not otherwise been scheduled, Mr. Roman's counsel shall file a status report as to his compliance with his bail conditions and indicate whether a status conference is needed.

SO ORDERED.



5/13/2020

UNITED STATES MAGISTRATE JUDGE